

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10306-PBS
)
TREVOR CHARLTON)

JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(C)

Pursuant to Local Rule 116.5(C), the United States and the defendant Trevor Charlton (collectively, the "parties") state as follows:

- (1) The parties know of no such issues.
- (2) No.
- (3) The defendant does not intend to raise a defense of insanity or public authority.
- (4) The government has not requested notice of alibi by the defendant.
- (5) The defendant intends to file a motion to suppress statements.
- (6) A schedule should be set with respect to the defendant's motion to suppress statements.
- (7) A resolution short of trial appears unlikely at this juncture.
- (8) The parties agree that the period from November 17, 2004 to and including the filing of the defendant's motion to suppress statements and the government's response thereto is excludable.
- (9) The parties estimate that the trial will last

approximately one week.

Respectfully submitted,

TREVOR CHARLTON
Defendant

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Martin Richey
J. Martin Richey
Federal Defender Office
408 Atlantic Avenue
Third Floor
Boston, MA 02110

By: /s/Robert E. Richardson
Robert E. Richardson
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
April 18, 2005

I, ROBERT E. RICHARDSON, hereby certify that I have caused a true copy of the foregoing to be served by electronic filing on J. Martin Richey, Federal Defender Office, 408 Atlantic Avenue, 3rd Floor, Boston, MA 02210.

/s/Robert E. Richardson
ROBERT E. RICHARDSON
Assistant U.S. Attorney